

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

|  |   |                                |
|--|---|--------------------------------|
| UNITED STATES OF AMERICA, et al., <i>ex rel.</i> , | ) |                                |
| DEBRA NORRIS,                                      | ) |                                |
|  | ) |                                |
| Plaintiffs,  | ) | CIVIL ACTION NO. 2:13-cv-00035 |
|  | ) | CHIEF JUDGE SHARP              |
| v.   | ) | MAGISTRATE JUDGE BRYANT        |
|  | ) |                                |
| MATTHEW ANDERSON, et al.,                          | ) |                                |
|  | ) |                                |
| Defendants.  | ) |                                |

**UNITED STATES' MOTION TO SUBSTITUTE  
A CORRECTED, AMENDED COMPLAINT IN INTERVENTION**

The United States respectfully moves this Court to substitute a corrected version of the proposed Amended Complaint in Intervention that is currently filed as Docket Number 67-1.

The United States inadvertently made a scrivener's error in failing to list proposed Defendant Cindy Scott as being subject to injunctive relief under the United States' new Controlled Substances Act claim. Accordingly, the corrected version adds Ms. Scott's name in two places:

- (1) in the heading to Count V (Controlled Substances Act) at page 50 of the Amended Complaint and
- (2) in the prayer for relief, paragraph 4, at page 52 of the Amended Complaint

This addition will not prejudice any Defendant, since the motion for leave to file the Amended Complaint is still pending.

The State of Tennessee does not object to this motion. The corrected Amended Complaint is attached to this motion.

Respectfully submitted,

DAVID RIVERA  
United States Attorney  
Middle District of Tennessee

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing is being served, by use of the Court's electronic case management system, on July 22, 2016, to the following:

|  |  |
|--|--|
| <p style="text-align: center;">Robert A. Peal<br/>Neal &amp; Harwell<br/>150 Fourth Avenue North<br/>Suite 2000<br/>Nashville, TN 37219<br/>Email: <a href="mailto:rpeal@nealharwell.com">rpeal@nealharwell.com</a></p>                                | <p style="text-align: center;">C. Gene Shiles, Jr.<br/>Spears Moore Rebman Williams<br/>P.O. Box 1749<br/>Chattanooga, TN 37401<br/>Email: <a href="mailto:ces@smrw.com">ces@smrw.com</a></p>  |
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s/Ellen Bowden McIntyre  
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